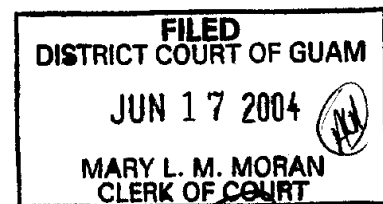


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Attorneys for Plaintiff
LA-RESA BLAS



IN THE UNITED STATES DISTRICT COURT

LA-RESA BLAS,

CIVIL CASE NO. 03-00027

Plaintiff,

vs.

STIPULATION

IMPERIAL SUITES, INC,
d/b/a IMPERIAL SUITES HOTEL
and BONG ROBATO,

Defendants.

COME NOW the parties, by and through their respective counsel and hereby
request to put the ^{Second Amended PC} ~~new~~ Scheduling Order and Discovery Order attached hereto to be
adopted by this Court. The reason the parties make this request is that the Defendant
Corporation is now defunct and consequently there are great difficulties in conducting
discovery with and obtaining discovery responses from the defunct Corporation.

SO STIPULATED.

Respectfully submitted,

LAW OFFICES OF GORMAN & GAVRAS

Date: May 11, 2004.

By: 

WILLIAM L. GAVRAS, ESQ.
Attorneys for Plaintiff
LA-RESA BLAS

ORIGINAL

KLEMM, BLAIR, STERLING & JOHNSON

Date: June 16, 2004.

By: _____


JEHAN'AD G. MARTINEZ, ESQ.

Attorneys for Defendant

IMPERIAL SUITES, INC. dba IMPERIAL
SUITES HOTEL

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IN THE UNITED STATES DISTRICT COURT

LA-RESA BLAS,

CIVIL CASE NO. 03-00027

Plaintiff,

vs.

IMPERIAL SUITES, INC,
d/b/a IMPERIAL SUITES HOTEL,

PROPOSED SECOND
AMENDED SCHEDULING
ORDER

Defendant.

PROPOSED SECOND AMENDED SCHEDULING ORDER

Pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure, and Rule 16.1 of the Local Rules of Practice for the District Court of Guam, the parties hereby submit the following Proposed Second Amended Scheduling Order:

1. The nature of the case is as follows:

Title VII Employment, Sexual Battery and/or Assault.

2. The posture of the case is as follows:

- a) The following motions are on file (pending):

None.

La-Resa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato, Civil Case No. 03-00027
Proposed Second Amended Scheduling Order
June 14, 2004

b) The following formal discovery has been initiated:

Discovery has been conducted.

3. All Motions to add parties and claims shall be filed on or before:

No parties or claims shall be added.

4. All Motions to amend pleadings shall be filed on or before:

September 17, 2004.

5. Status of Discovery:

The Discovery Plan (filed concurrently herewith) is adopted and incorporated as part of this Proposed Second Amended Scheduling Order.

6. The parties shall appear before the District Court on _____ at _____ for the Scheduling Conference.

7. The discovery cut-off date (defined as the last day to file responses to discovery) is: September 1, 2004.

8. a) The anticipated discovery motions are:

None at this time.

b) All discovery motions shall be filed on or before September 7, 2004. These motions will be heard on or before September 24, 2004.

c) All dispositive motions shall be filed on or before October 8, 2004 and heard on or before October 26, 2004.

La-Resa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato, Civil Case No. 03-00027
Proposed Second Amended Scheduling Order
June 14, 2004

9. The prospects for settlement are:

Unknown at this time.
10. The Preliminary Pretrial Conference shall be held on October 26, 2004 at 3:15 p.m. (no later than 21 days to trial date).
11. The parties' pretrial materials, discovery materials, witness lists, designations and exhibit lists shall be filed on or before November 2, 2004 (no later than 14 days prior to Trial).
12. The Proposed Pretrial Order shall be filed on or before November 2, 2004 (no later than 14 days prior to Trial).
13. The Final Pretrial Conference shall be held on November 9, 2004 at 3:00 p.m. (no later than 7 days prior to Trial).
14. The Trial shall be held on November 16, 2004 at 9:30 a.m.
15. The Plaintiff seeks a jury trial.
16. It is anticipated that it will take two to three (2-3) days to try this case.
17. The names of counsel on this case are:

William L. Gavras, Esq. for Plaintiff La-Resa Blas

Jehan'Ad G. Martinez, Esq. for Imperial Suites, Inc. dba Imperial Suites Hotel

La-Resa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato, Civil Case No. 03-00027
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June 14, 2004

18. The Parties are amenable to submitting this case to a settlement conference.
19. The parties present the following suggestions for shortening trial:
None at this time.
20. The following issues will affect the status or management of the case:
Unknown at this time

Dated: _____, 2004.

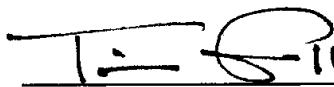

Chief District Judge

APPROVED AS TO FORM AND CONTENT:

LAW OFFICES OF GORMAN & GAVRAS

Date: June 14, 2004

BY:

 
WILLIAM L. GAVRAS, ESQ.
Attorneys for Plaintiff
LA-RESA BLAS

KLEMM, BLAIR, STERLING & JOHNSON

Date: June 16, 2004.

BY:


JEHAN'AD G. MARTINEZ, ESQ.
Attorneys for Defendant
IMPERIAL SUITES, INC, dba IMPERIAL SUITES HOTEL

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Attorneys for Plaintiff
LA-RESA BLAS

IN THE UNITED STATES DISTRICT COURT

LA-RESA BLAS,

CIVIL CASE NO. 03-00027

Plaintiff,

vs.

IMPERIAL SUITES, INC,
d/b/a IMPERIAL SUITES HOTEL,

SECOND AMENDED
DISCOVERY PLAN

Defendant.

AMENDED DISCOVERY PLAN

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rule 16.2, the parties agree to and hereby submit the following plan:

A. Depositions of fact witnesses may begin at once and be taken as needed, prior to the discovery cutoff date. Some of the parties may call expert witnesses in this case.

B. Unless additional discovery is ordered by the Court, the parties also may propound one set each of interrogatories (25 maximum) and requests for admissions (25 maximum). Requests for production may also be propounded. This discovery shall be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

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Suites Hotel and Bong Robato, CV 03-00027**
Second Amended Discovery Plan
June 14, 2004

C. The parties, except as otherwise noted, agree to provide all prediscovery and preliminary discovery mandated by Local Rules and FRCP Rule 26 by May 18, 2004. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is ongoing.

D. All parties will exchange names and reports (if any) of expert witnesses on or before July 18, 2004.

E. The specific subjects on which discovery may be needed are:

Facts supporting the nature of the claims and defenses.

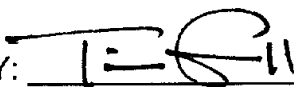
F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the Federal and Local Rules.

G. The Cutoff date for discovery is September 1, 2004.

APPROVED AS TO FORM AND CONTENT:


LAW OFFICES OF GORMAN & GAVRAS

Date: June 14, 2004.

BY:  *for*
WILLIAM L. GAVRAS, ESQ.
Attorneys for Plaintiff
LA-RESA BLAS

KLEMM, BLAIR, STERLING & JOHNSON

Date: June 16, 2004.

BY: 
JEHAN'AD G. MARTINEZ, ESQ.
Attorneys for Defendant
IMPERIAL SUITES, INC, dba IMPERIAL
SUITES HOTEL